

Federal Communications Commission

May 8, 2004

Electronic Comment Docket 99-325

Submitted by: Paul W. Smith  
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Dear Commission:

I would hope that you will still continue to prohibit night time digital IBOC transmission on the medium wave broadcast band.

Ibiquity's own testing submitted to you under this docket indicates that after full implementation of digital IBOC on medium wave, secondary service will be lost. Please understand that there are a lot of people that depend on that secondary nighttime service. Examples are blind people that want to listen to major league sports teams play by play that are normally broadcast from the Class A AM stations.

Another example was the recent power outages that plagued the northeast and Midwest. People depended on those large class A stations for information regarding the emergency. They were the only ones with the backup equipment, and the Staff to provide this information. Portable AM radios were the only means of getting information during this time. This service will be lost upon night implementation of IBOC on the medium wave broadcast band.

If the airwaves truly belong to the public, then these stations should still be required to provide service to the secondary areas, especially when needed in time of emergency like the power outages.

In crafting the rules for digital broadcasting, I would hope that the FCC take into consideration the above comments and allow for them.

Respectfully submitted by

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